

Approved.

/s/ Benita Y. Pearson on 8/2/2018

United States District Judge

(1:17-CV-2073)

**STIPULATION REGARDING INADVERTENT DISCLOSURE OF
ATTORNEY-CLIENT PRIVILEGE, WORK PRODUCT PROTECTION OR
OTHER APPLICABLE PRIVILEGE**

IT IS HEREBY STIPULATED to, between the parties, through their respective counsel, as follows:

- i. Any inadvertent disclosure or production of documents protected by the parties' attorney-client privilege, work product protection or other applicable privilege will not constitute a waiver of either any available privilege or protection by the disclosing party.
- ii. In the event that the receiving party discovers that it has received documents protected by the attorney-client privilege, work product protection or other applicable privilege, it will bring that fact to the attention of the producing party immediately upon discovery.
- iii. In the event that the producing party discovers that it has produced documents protected by the attorney-client privilege, work product protection or other applicable privilege, it will bring that fact to the attention of the receiving party immediately upon discovery.
- iv. Upon request of the producing party, the receiving party will promptly return to the producing party any documents protected by the party's attorney-client privilege, work product protection or other applicable privilege and any copies that the receiving party may have made.
- v. Upon the request of the producing party, the receiving party

(1:17-CV-2073)

will promptly disclose the names of any individuals who have read or have had access to the documents protected by the party's attorney-client privilege, work product protection or other applicable privilege.

vi. No such inadvertently produced documents protected by the parties' attorney-client privilege, work product protection or other applicable privilege may be used in evidence against the producing party.

vii. Attorney-client privilege and work product protection shall have the meanings as provided in FRE 502 (g) (1) and (2).

Stipulated by:

/s/ Phillip J. Tripi
Attorney for Plaintiff

/s/ Brian A. Murray (by telephonic consent)
Attorney for Claimant